

REMARKS

Reconsideration of this application, in view of the foregoing amendment and the following remarks, is respectfully requested.

Claims 1-48 were originally presented for consideration in this application. Claims 28, 40 and 48 have previously been canceled. Accordingly, claims 1-27, 29-39 and 41-47 are currently pending in this application.

The examiner's indication that claims 1-27, 29-39 and 41-45 are allowed is noted with appreciation. The only remaining issue in the Office Action is the rejections of claims 46 and 47 under 35 USC 102(b) as being anticipated by U.S. Patent No. 5,680,901 to Gardes.

The rejected independent claim 46 recites a wellbore junction forming method, in which four tubular strings are connected to the wellbore junction. In FIG. 5 of the Gardes patent, at least three tubular strings 71 and a casing 14 are shown connected to a wellbore junction which is made up of multiple individual sections 10.

However, a disadvantage of the Gardes wellbore junction system is that the tubular strings 71 have to be installed and retrieved in a particular order and, once installed, each tubular string blocks access to the tubular string below it. The embodiments described in the present application permit multiple tubular strings to be installed in any order, and without blocking access to any of the other tubular strings.

Independent claim 46 has been amended above to recite that the first, second and third tubular strings are extended into the respective first, second and third


wellbores, without restricting access between the fourth tubular string and any of the first, second and third tubular strings. Gardes does not describe this feature now recited in claim 46 and, thus, the claim and its dependent are not anticipated by Gardes. Therefore, the examiner is respectfully requested to withdraw the rejections of claims 46 and 47.

In view of the foregoing amendment and remarks, all of the claims pending in this application are now seen to be in a condition for allowance. A Notice of Allowance of claims 1-27, 29-39 and 41-47 is therefore earnestly solicited.

The examiner is hereby requested to telephone the undersigned attorney of record at (972) 516-0030 if such would expedite the prosecution of the application.

Respectfully submitted,

SMITH IP SERVICES, P.C.

A handwritten signature in black ink, appearing to read "Marlin R. Smith". The signature is fluid and cursive, with the first name "Marlin" being the most prominent part.

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